

TSU File Inventory Index

Date: August 27, 2002

Initial: CMG/encas

Facility Name: <u>ISG Herkimer, Inc.</u>			
Facility Identification Number: <u>1LD 000 781 591</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status <u>A-2</u>	1	.1 Correspondence	
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	✓	C.1 Compliance - (Inspection Reports) <u>See C.2</u>	
.3 Part A Application and Amendments	✓	C.2 Compliance/Enforcement <u>C.2</u>	1
.4 Financial Insurance (Sudden, Non Sudden)	X	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents <u>3.3</u>	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports <u>A-3.4</u>	1	.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence <u>A-4.1-A-4.2-A-4.3-A-4.5</u>	1	.4 RFA Reports <u>D-1.4</u>	1
.2 Closure/Post Closure Plans, Certificates, etc <u>See A-4.1</u>		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 5

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments:

1 Box - 8 folders labeled July 2003 - List Attached to main July file.

RCRA INSPECTION REPORT

USEPA #: IL <u>D000781591</u>	IEPA #: <u>1558010006</u>
Facility Name: <u>LTV Steel Company</u>	Phone #: <u>815-925-2133</u>
Street Address: <u>P.O. Box 325</u>	County: <u>Putnam</u>
City: <u>Hennepin</u>	State: <u>Illinois</u> Zip: <u>61327</u>
Region: <u>Rockford</u>	Inspection Date: <u>4/21/93</u> From: <u>10:00am</u> To: <u>10:27am</u>
Weather: <u>cloudy, 42°F</u>	RECEIVED WED-PCRA JUN 09 1993

TYPE OF FACILITY

Notified As: G S02 D79		Regulated As: G D79	
LDF? YES HPV? NO (Yes or No)	90-Day F/U Required?: YES _____ NO <input checked="" type="checkbox"/>		

TYPE OF INSPECTION

CEI: _____ Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: ☒ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 8/8/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: 11/14/89

Part A Withdrawal requested: 10/31/89 Approved by (US)(IL) EPA: / /

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 12/31/84 Final Permit Issued: 8/10/87

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or (N) ___/___/___

Illinois Attorney General: Y or (N) ___/___/___ County State's Attorney: Y or (N) ___/___/___

ORDERS ISSUED

CACO: ____/____/____ CAFO: ____/____/____ Consent Decree: ____/____/____
Federal Court Order: ____/____/____ State Court Order: ____/____/____ IPCB Order: ____/____/____

TSD FACILITY ACTIVITY SUMMARY[illegible]



RECEIVED
JAN 10 1964
FBI - NEW YORK

10

OWNER**OPERATOR**

Name	LTV Steel Company	Name	LTV Steel Company
Address	25 Prospect Avenue NW	Address	P.O. Box 325
City	Cleveland	City	Hennepin
State	Ohio	State	Illinois
Zip	44115	Zip	61324
Phone #	216-622-5000	Phone #	815-925-2311

PERSON(S) INTERVIEWED**TITLE****PHONE #**

Paul Schlingman	General Supervisor	815-925-2133

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

Kari Hanson	IEPA / ERS	815-987-7760

PREPARED BY**AGENCY/TITLE****PHONE #**

Kari Hanson	IEPA / ERS	815-987-7760
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SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

NARRATIVE

On April 12, 1993 Kari Hanson/IEPA conducted a Comprehensive groundwater Monitoring Evaluation (CME) at LTV Steel in Hennepin, Illinois. Mr. Paul Schlingman, the General Supervisor, represented LTV. Processes at the plant include pickling, cold rolling, and galvanizing coils of steel.

LTV originally notified as a generator, a disposal facility, and a storage facility. The storage units (SO2) were the two 150,000 gallon waste tanks. LTV certified that the waste in these tanks was never stored greater than 90 days, so LTV requested that they be removed from the part A. The Agency approved this withdrawal on November 14, 1989.

The disposal unit is the Class I hazardous waste injection well. The well injects K062 waste pickle liquor. The injection well has been regulated under the UIC program since LTV received its UIC operating permit on August 10, 1987. Neither 35 Ill. Adm. Code Part 725 Subpart F or 35 Ill. Adm. Code Part 724 regulations apply towards this disposal unit since it is regulated under the UIC program.

No other hazardous waste disposal or storage units were found on site. There wasn't a groundwater monitoring system to evaluate because there wasn't any RCRA hazardous waste disposal or storage units on site.

It should be noted that a Permit & Inspection Fee inspection was conducted at this time also. This inspection makes sure that the injection well is operated according to its UIC permit. There were not any violations of this permit.

N/A — On site disposal of hazardous waste is through an injection well 9950.2 which is covered under the VIC program and its regulations — not Subpart F regulations

APPENDIX A COMPREHENSIVE GROUND-WATER MONITORING EVALUATION WORKSHEET

The following worksheets have been designed to assist the enforcement officer/technical reviewer in evaluating the ground-water monitoring system an owner/operator uses to collect and analyze samples of ground water. The focus of the worksheets is technical adequacy as it relates to obtaining and analyzing representative samples of ground water. The basis of the worksheets is the final RCRA Ground Water Monitoring Technical Enforcement Guidance Document which describes in detail the aspects of ground-water monitoring which EPA deems essential to meet the goals of RCRA. Appendix A is not a regulatory checklist. Specific technical deficiencies in the monitoring system can, however, be related to the regulations as illustrated in Figure 4.3 taken from the RCRA Ground-Water Monitoring Compliance Order Guide (COG) (included at the end of the appendix). The enforcement officer, in developing an enforcement order, should relate the technical assessment from the worksheets to the regulations using Figure 4.3 from the COG as a guide.

Comprehensive Ground-Water Monitoring Evaluation	Y/N
I. Office Evaluation Technical Evaluation of the Design of the Ground-Water Monitoring System	
A. Review of Relevant Documents	
1. What documents were obtained prior to conducting the inspection:	
a. RCRA Part A permit application?	N/A
b. RCRA Part B permit application?	
c. Correspondence between the owner/operator and appropriate agencies or citizen's groups?	
d. Previously conducted facility inspection reports?	
e. Facility's contractor reports?	
f. Regional hydrogeologic, geologic, or soil reports?	
g. The facility's Sampling and Analysis Plan?	
h. Ground-water Assessment Program Outline (or Plan, if the facility is in assessment monitoring)?	
i. Other (specify) _____	

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL 0000781591 IEPA #: 1558010001
 Facility Name: JONES & LAUGHLIN STEEL CORP (LTV STEEL CO) Phone #: 815/925-2133
 Street Address: P.O. Box 325 County: Putnam
 City: Hennepin State: Illinois Zip: 61327
 Region: Rockford Inspection Date: 2/2/93 From: 9:25am To: 10:55am
 Weather: 40°F, sunny

TYPE OF FACILITY

Notified As: G/D Regulated As: G/D
 LDF? yes HPV? no 90-Day F/U Required?: YES NO ✓

TYPE OF INSPECTION

CEI: ✓ Sampling: Citizen Complaint: Closed: Other:
 CME/O&M: Record Review: Follow-Up to Inspection of: Withdrawal:

NON-REGULATED STATUS

SQG: Claimed Nonhandler: Other (Specify in Narrative):

PART A

Notification Date: 8/18/80, from (initial) or (subsequent) Notification.
 Initial Part A Date: 11/18/80 Amended: 11/14/89
 Part A Withdrawal requested: 10/31/89 Approved by (US)(IL) EPA: / /

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 12/31/84 Final Permit Issued: 8/10/87

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or (N) / /
 Illinois Attorney General: Y or (N) / / County State's Attorney: Y or (N) / /

ORDERS ISSUED

CACO: / / CAFO: / / Consent Decree: / /
 Federal Court Order: / / State Court Order: / / IPCB Order: / /

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?			Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report		
		Was Activity Ever Done?						1990	1991	1992
D79	Y	Y	Y	N	Y	N/A		Y	Y	Y
SO2	N	N	N	N/A	N	N/A		N	N	N

RECEIVED

9 MAR 1993

IEPA/DLPC

OWNER

OPERATOR

Name	LTV Steel Company	Name	LTV Steel Company
Address	25 Prospect Avenue NW	Address	P.O. Box 325
City	Cleveland Cleveland	City	Hennepin
State	Ohio	State	Illinois
Zip	44115	Zip	61327
Phone #	216 / 622-5000	Phone #	815 / 925-2311

PERSON(S) INTERVIEWED

TITLE**PHONE #**

Paul Schlingman	General Supervisor	815-925-2133

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

Kari Hanson	IEPA / EPS	815-987-7760

PREPARED BY

AGENCY/TITLE**PHONE #**

Kari Hanson	IEPA / EPS	815-987-7760
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SUMMARY OF APPARENT VIOLATIONS

[illegible][illegible][illegible]

Facility Name: LTV Steel
 USEPA #: IL 000781591
 IEPA #: 1558010001

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #		On Annual Report for: (Circle if present; cross out if not present)				Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition	
			* On 8700-12	* On 3510-3	* 19 90	* 19 91	* 19 92						
② waste pickle liquor	descaling of steel coils	1-14-93	K062	X	X	G	G	G	G	40,000 gallons	150,000 - 200,000 gallons/week	none shipped off site in 1992	on site disposal in the Class I injection well.
① chromic acid	galvanizing line	chromic acid is 1% of total hazardous waste generated.				G	G	G	G	* It is pumped with the waste pickle liquor and combined in the transmission lines on the way to the accumulation tanks.			
						F	F	F	F				
						G	G	G	G				
						F	F	F	F				
						G	G	G	G				
						F	F	F	F				
						G	G	G	G				
						F	F	F	F				
						G	G	G	G				
						F	F	F	F				
						G	G	G	G				
						F	F	F	F				
						G	G	G	G				
						F	F	F	F				
						G	G	G	G				
						F	F	F	F				

* All "NO" responses must be explained in narrative.

* see narrative

NARRATIVE

On February 2, 1992 Kari Hanson/IEPA conducted a Compliance Evaluation Inspection (CEI) at LTV Steel Company in Hennepin, Illinois. Mr. Paul Schlingman, General Supervisor, represented LTV. Processes at the plant include pickling, cold rolling, and galvanizing coils of steel.

This CEI addresses the RCRA generator requirements only because their disposal unit (D79) --a Class I injection well-- is regulated under the UIC program. Besides notifying as a generator and a disposal facility, LTV notified as a storage facility (S02) also. The IEPA approved the withdrawal of the two 150,000 gallon waste tanks from the Part A on November 14, 1989 because LTV certified that waste had never been stored greater than 90 days in the tanks.

The following hazardous waste is generated:

- (1) **K062 Waste Pickle Liquor/Chromic Acid** - Hydrochloric acid used to remove rust and scale from steel coils results in waste pickle liquor. This waste is recirculated in a 30,000 gallon tank (photo #6) until it can no longer be used. At that time it is discharged into the transmission lines (photo #7) which carry the waste to the two 150,000 gallon waste accumulation tanks (photo #8). Once enough waste has accumulated, it is discharged into the injection well. Chromic acid is a waste generated from the galvanizing line. Since chromic acid is less than 1% of the total waste stream, it is combined with the pickle liquor in the transmission lines. LTV generates between 150,000 and 200,000 gallons of waste per week.

Prior to 1992, the waste was occasionally shipped off-site to K.A. Steel in Indiana. K.A. Steel would treat the waste to reclaim the hydrochloric acid and iron. The last shipment of 4,778 gallons went out on July 15, 1991. Since that time, K062 has only been disposed of through the injection well.

At the time of this inspection, there was approximately 40,000 gallons of waste in the accumulation tanks.

LTV is regulated as a full scale generator (G1) and a land disposal facility under the UIC program (D79).

No violations were observed during this inspection.

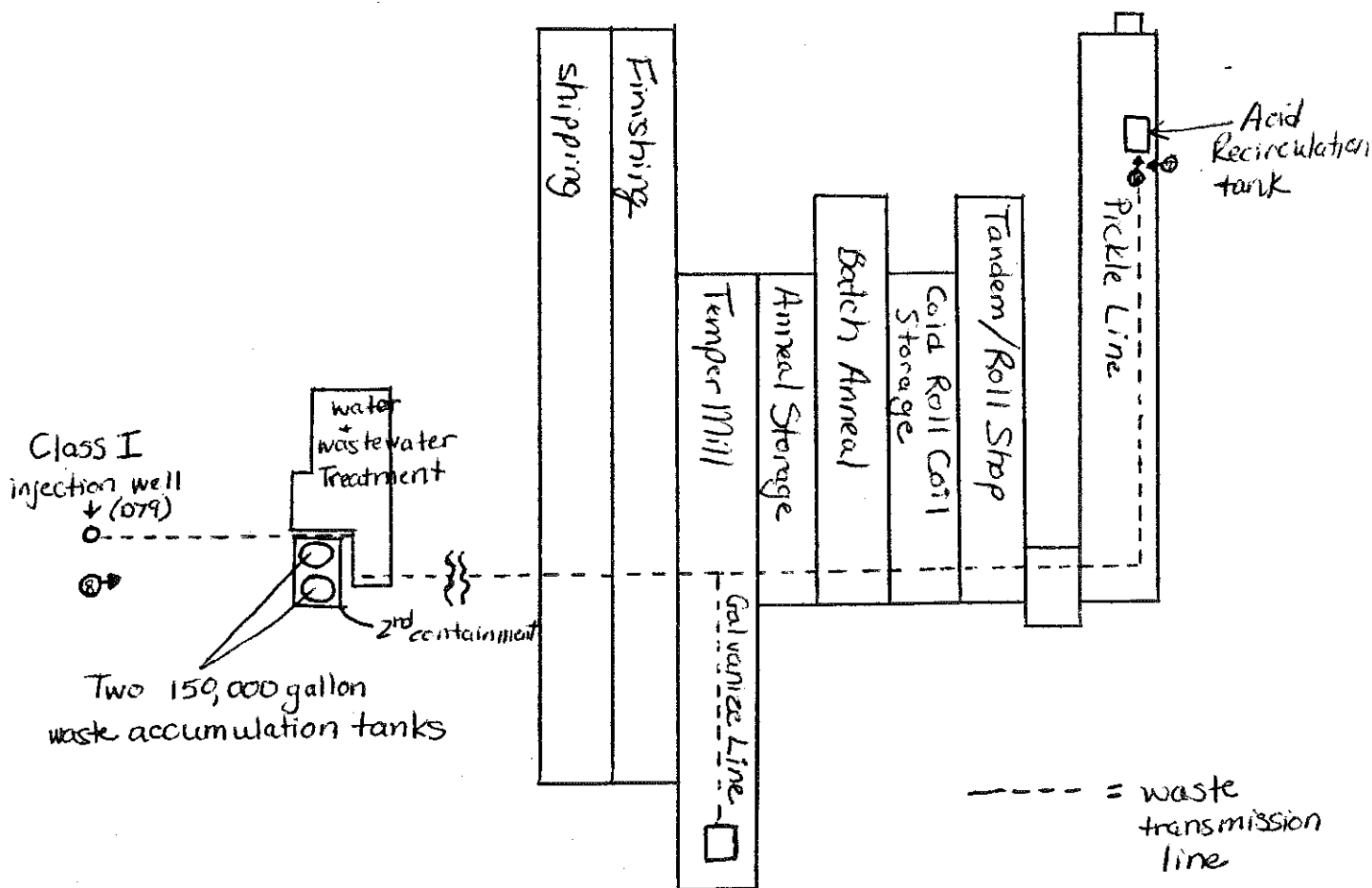
STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: 2/2/93 Inspector: Hanson
Site Code: 155 01 05 001 County: Putnam
Site Name: LTV Steel Company Time: 9:25am - 10:55am

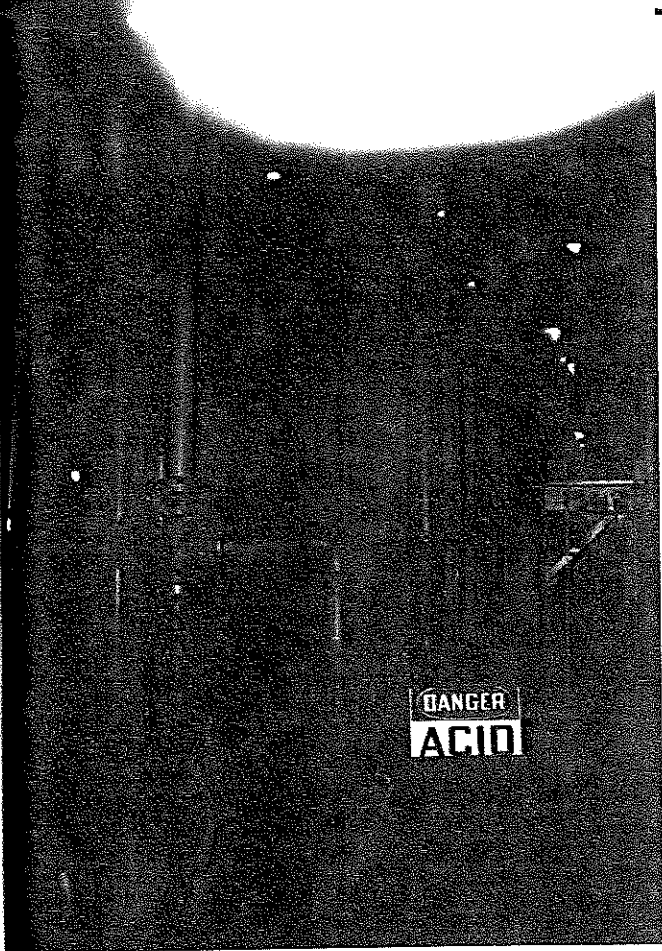
○ → = photo
4 N

Shop
+
office

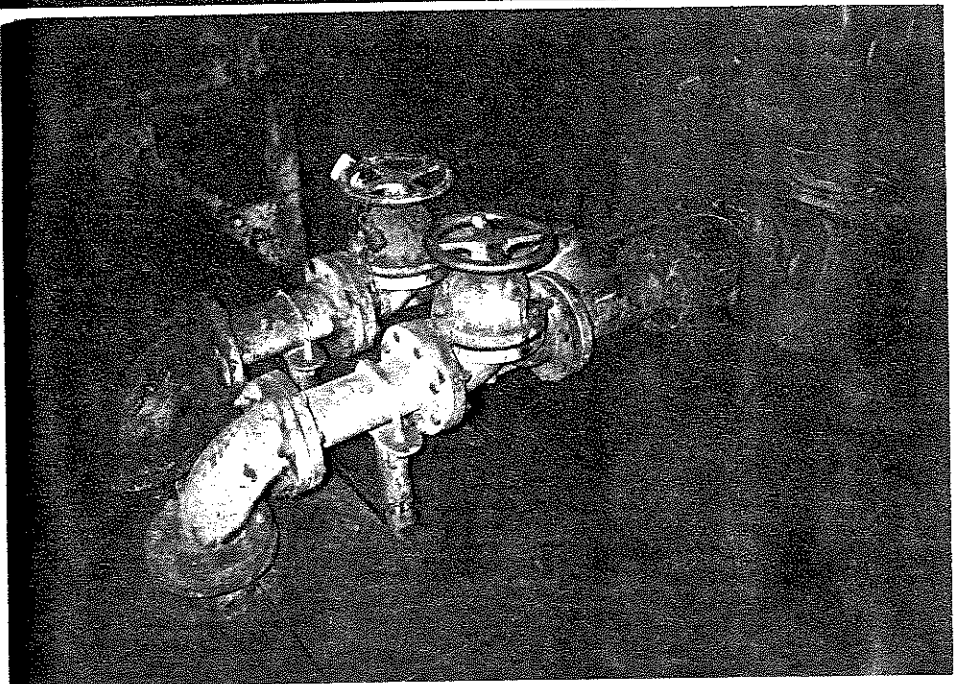




INSPECTION PHOTOS

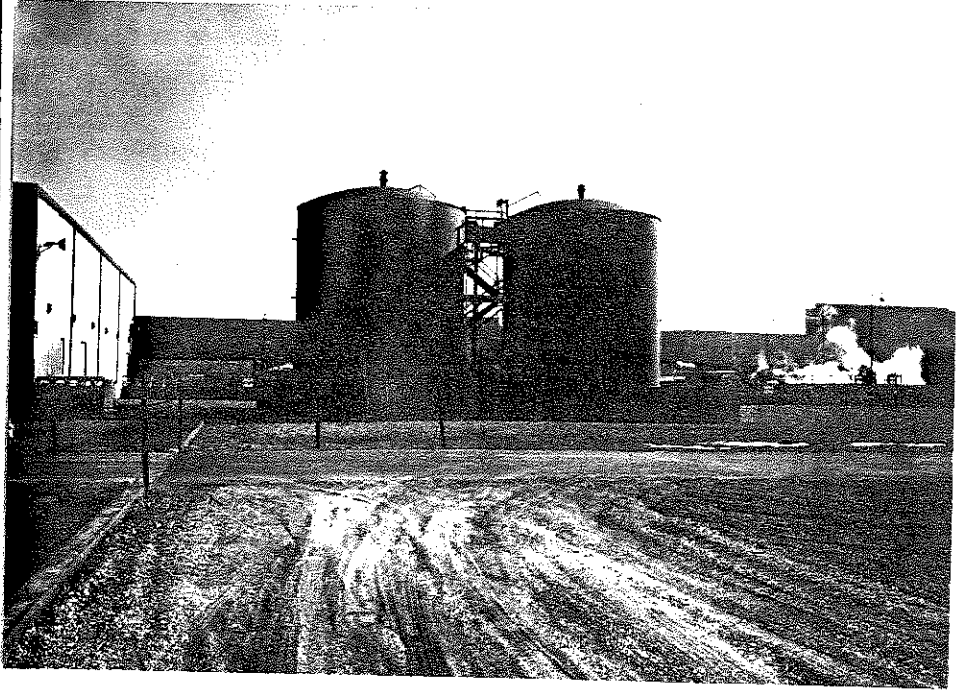
DATE: <u>2</u> / <u>2</u> / <u>93</u>	SITE #: <u>1</u> <u>5</u> <u>5</u> <u>8</u> <u>0</u> <u>1</u> <u>0</u> <u>0</u> <u>0</u> <u>1</u> CO.: Putnam
TIME: 10:19 a.m.	SITE NAME: LTV Steel
PHOTOGRAPH TAKEN BY: Kari Hanson <i>KH</i>	
COMMENTS: Pictures taken toward: Facing north.	
30,000 gallon acid recirculation tank.	
ROLL #: 834 PHOTO #: 6	

DATE: <u>2</u> / <u>2</u> / <u>93</u>
TIME: 10:20 a.m.
PHOTOGRAPH TAKEN BY: Kari Hanson <i>KH</i>
COMMENTS: Pictures taken toward: Facing west. Pipes and valves leading from tank to transmission lines.
ROLL #: 834 PHOTO #: 7





INSPECTION PHOTOS

DATE: <u>2</u> / <u>2</u> / <u>93</u>	SITE #: <u>1</u> <u>5</u> <u>5</u> <u>8</u> <u>0</u> <u>1</u> <u>0</u> <u>0</u> <u>0</u> <u>1</u> CO.: Putnam
TIME: 10:43 a.m.	SITE NAME: LTV Steel
PHOTOGRAPH TAKEN BY: Kari Hanson ✓	
COMMENTS: Pictures taken toward: Facing east. Two 150,000 gallon waste accumulation tanks.	
ROLL #: 834 PHOTO #: 8	

DATE: ___ / ___ / ___
TIME:
PHOTOGRAPH TAKEN BY:
COMMENTS: Pictures taken toward:
ROLL #: PHOTO #:

NO
PHOTO

FOS

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart B: Prohibitions				RECEIVED - 9 MAR 1993 IEPA/DLPC
				Section 703.121: RCRA Permits				
				a Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only: 1) With a RCRA permit for the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) In conformance with all conditions imposed by the RCRA permit? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				b Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				b Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

PER-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications				
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments, that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes _____ No _____ N/A _____</p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes _____ No _____ N/A _____</p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes _____ No _____ N/A _____</p>				

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____ Is the facility only operating with a RCRA permit? Yes _____ No _____ NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			✓	
OTH	1				Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes _____ No _____ N/A _____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes _____ No _____ N/A _____ NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.			✓	

PER-C-2

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr		Sub Sec	Yes		
OTH	1			<p>Section 703.154: Prohibitions During Interim Status</p> <p>During interim status, has the facility refrained from:</p> <p>a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes _____ No _____</p> <p>b - Employing processes not specified in Part A of the permit application? Yes _____ No _____</p> <p>c - Exceeding the design capacities specified in Part A of the permit application? Yes _____ No _____</p>			<input checked="" type="checkbox"/>	
OTH	1			<p>Section 703.155: Changes During Interim Status</p> <p><u>NOTE:</u> Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.</p> <p>d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes _____ No _____ N/A _____</p>			<input checked="" type="checkbox"/>	

PER-C-3

Area	Class	90 Day F.U. Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1				PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it gener- ates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1				Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facili- ties that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	<input checked="" type="checkbox"/>			<i>No hazardous waste was shipped off site in 1992. The last shipment off site went to K.A. Steel in Indiana on 7/15/91. The manifest # INA0535104. Manifests prior to 1992 were adequate.</i>
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> <i>N/A</i> <input checked="" type="checkbox"/>				

GEN-B-1

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes _____ No _____ N/A <input checked="" type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No _____ N/A _____	<input checked="" type="checkbox"/>			Indiana manifest was used.
MAN	2			Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			Section 722.123: Use of the Manifest For each manifest received, has the generator: <ol style="list-style-type: none"> Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No _____ Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No _____ 	<input checked="" type="checkbox"/>			

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging Is waste which is ready for transportation, off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	
OTH	1	X			Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X			Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____ b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____			✓	

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			✓	<i>If waste is shipped off site the transporter provides placards.</i>
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	✓			

GEN-C-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<p>Section 722.134: Accumulation Time</p> <p>NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p> <p>a1 For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p style="padding-left: 40px;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p style="padding-left: 40px;">Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>a3 For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p style="padding-left: 40px;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a4 Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p style="padding-left: 40px;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

GEN-C-2(a)

Pages GEN-C-3 changed
GEN-C-5 removed. (HAW)

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below:</p> <p>NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.</p> <p>NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.</p> <p>Assessment of Existing Tank Systems (Section 725.291)</p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No ____ <i>N/A</i> ✓</p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p> <p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes ____ No ____</p>				<p><i>Tanks have secondary containment.</i></p>

GEN-C-5

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					<p>Design and Installation of New Tank Systems or Components (Section 725.292)</p> <p>Is secondary containment provided for any new tank system (constructed after July 14, 1986) before being put into service? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes _____ No _____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standard for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes _____ No _____ <p>Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____</p> <p>Containment and Detection of Releases (Section 725.293)</p> <p>Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				

GEN-C-6

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					<p>For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><u>or</u></p> <p>If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p> <p>Are spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-7

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p> <p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p> <p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p> <ol style="list-style-type: none"> 1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p>				

GEN-C-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>General Operating Requirements (Section 725.294)</p> <p>Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <input checked="" type="checkbox"/> No ____</p> <p>Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

GEN-C-9

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Inspections (Section 725.295)</p> <p>Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Response to Leaks or Spills and Disposition of Tank Systems (Section 725.296)</p> <p>Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>NOTE: If "No", skip to Closure and Post Closure Care (Section 725.297). If "Yes", answer the following questions.</p> <p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <ol style="list-style-type: none"> 1) Ceased using, stopped inflow of wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes <input type="checkbox"/> No <input type="checkbox"/> 3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes <input type="checkbox"/> No <input type="checkbox"/> 				

GEN-C-10

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
					<p>4) Reported to the Agency within 24 hours of detection? Yes _____ No _____</p> <p>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes _____ No _____</p> <p>If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes _____ No _____ N/A _____</p> <p>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</p> <p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes _____ No _____ N/A _____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use? Yes _____ No _____ N/A _____</p>				

GEN-C-11

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					<p>Closure and Post Closure Care (Section 725.297) <i>N/A</i></p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Special Requirements for Ignitable or Reactive Wastes (Section 725.298).</p> <p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes _____ No _____</p> <p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____</p> <p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes _____ No _____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p> <p>Special Requirements for Ignitable or Reactive Wastes (Section 725.298)</p> <p>Are ignitable or reactive wastes stored in tanks? Yes _____ No <input checked="" type="checkbox"/></p> <p>NOTE: If "No", skip to Special Requirements for Incompatible Wastes (Section 725.299).</p>				

GEN-C-12

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes _____ No _____</p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>Are there proper protective distances between the waste management area and the facility boundary line? Yes _____ No _____</p> <p>Special Requirements for Incompatible Wastes (Section 725.299)</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes _____ No _____ N/A <u>✓</u></p>				

GEN-C-13

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No _____</p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below:</p> <p>Maintenance and Operation of Facility (Section 725.131)</p> <p>Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:</p> <ul style="list-style-type: none"> - Air; - Soil; or - Surface Water, <p>which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No _____</p>				

GEN-C-14

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Required Equipment (Section 725.132)</p> <p>Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:</p> <ul style="list-style-type: none"> - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p>				

GEN-C-15

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Testing and Maintenance of Equipment (Section 725.133)</p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>Access to Communications or Alarm Systems (Section 725.134)</p> <p>Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 735.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-16

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Required Aisle Space (Section 725.135)</p> <p>Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Document non-compliance with photograph.</p> <p>Arrangements with Local Authorities (Section 725.137)</p> <p>Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at this facility and the potential need for the services of these organizations:</p> <p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

GEN-C-17

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No:
			Sub Sec		Yes	No		
				<p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes _____ No _____ NA <input checked="" type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart D: Contingency Plan and Emergency Procedures listed below:</p> <p>Purpose and Implementation of Contingency Plan (Section 725.151)</p> <p>Is a plan available? Yes <input checked="" type="checkbox"/> No _____</p> <p>NOTE: If answer is "No", skip to Emergency Coordinator (Section 725.155).</p>				

GEN-C-18

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
					<p>Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Content of Contingency Plan (Section 725.152)</p> <p>Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:</p> <p>1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-19

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If more than one person is designated as an emergency coordinator, is a primary coordinator identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the plan identify:</p> <ol style="list-style-type: none"> 1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-20

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
					<p>Does the plan identify the signal to be used to begin evacuation? Yes ____ No ____</p> <p>Are alternate evacuation routes identified? Yes ____ No ____</p> <p>Copies of Contingency Plan (Section 725.153)</p> <p>Has a copy (and all revisions) of the contingency plan:</p> <p>a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No ____</p> <p>b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No ____</p> <p>Amendment of Contingency Plan (Section 725.154)</p> <p>Has the contingency plan been reviewed and, if necessary, amended whenever:</p> <p>1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No ____</p> <p>2) The plan fails in an emergency? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

GEN-C-21

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					<p>3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes in the response necessary in an emergency? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>4) The list of emergency coordinators changes? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>5) The list of emergency equipment changes? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>Emergency Coordinator (Section 725.155)</p> <p>Is there an emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No ____</p> <p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes <input checked="" type="checkbox"/> No ____</p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes <input checked="" type="checkbox"/> No ____</p>				

GEN-C-22

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>Emergency Procedures (Section 725.156)</p> <p>Has the facility had a release, fire or explosion? Yes _____ No <input checked="" type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column of 722.134.</p> <p>a4 Has the generator complied with the requirements of 35 Ill. Adm. Code 725.116: Personnel Training listed below:</p> <p>Personnel Training (Section 725.116)</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No _____</p> <p>NOTE: If "No", skip to Subsection (c)1 page GEN-C-26.</p> <p>Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No _____</p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No _____</p> <p>Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No _____</p>				

GEN-C-23

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					<p>Does the program cover, at a minimum:</p> <p>1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Response to fire or explosion? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>5) Response to groundwater contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Has the facility conducted an annual review of the initial training? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-24

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

GEN-C-25

pages GEN-C-26 127
removed (RAW)

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years:	<input checked="" type="checkbox"/>			
			a - A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
			b	- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	2				Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	<input checked="" type="checkbox"/>			
MAN	1				Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes _____ No _____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes _____ No _____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			<input checked="" type="checkbox"/>	

GEN-D-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p>				
					<p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				

GEN-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes _____ No _____ <u>NOTE:</u> If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes _____ No _____ <u>NOTE:</u> If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.				

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			✓	
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used;				
				and b2 Has the importer or his agent signed the manifest in place of the generator;				
				and b2 Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2	X			PART 722 GENERATOR STANDARDS Subpart G: Farmers Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ <p>NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>			✓	

GEN-G-1

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>PART 728 LAND DISPOSAL RESTRICTIONS</p> <p>Section 722.111(d) - Waste Identification (Information Only)</p> <p>1. Does the facility handle the following wastes?</p> <p>a. F001 through F005 spent solvents Yes ____ No ____ List* _____</p> <p>b. Dioxin-containing wastes Yes ____ No ____ List* _____</p> <p>c. California List wastes Yes ____ No ____ List* _____</p> <p>d. First, Second and Third Third wastes Yes <input checked="" type="checkbox"/> No ____ List* <u>K062</u></p> <p>*List waste if room allows or attach Appendix A.</p> <p>2. Does the facility handle the following wastes (National Capacity Variances)?</p> <p>a. F001-F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date - 11/8/90). Yes ____ No <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>		<p>Environmental Protection Agency State of Illinois</p> <p>RECEIVED ROCKFORD REGION FEB 25 1991</p>	

RECEIVED
22 FEB 1991
IEPA/DLPC

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/8/90).</p> <p>Yes _____ No <input checked="" type="checkbox"/></p> <p>c. California List contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/8/90).</p> <p>Yes _____ No <input checked="" type="checkbox"/></p> <p>d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052 or K071 (effective date - 8/8/90).</p> <p>Yes _____ No <input checked="" type="checkbox"/></p> <p>e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103 and K104 (effective date - 8/8/90).</p> <p>Yes _____ No <input checked="" type="checkbox"/></p> <p>f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 6/8/91)</p> <p>Yes _____ No <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.												
				YES	NO														
			<p>Section 728.107 - Waste Analysis Treatability Group - Treatment Standards Identification)</p> <p>F-solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>If yes, check the appropriate treatability group.</p> <p>____ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight).</p> <p>____ All other spent solvent wastes.</p> <p>First, Second and Third Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?</p> <p>Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>If yes, list the waste code and check the correct treatability group.</p> <table border="0"> <thead> <tr> <th><u>Waste Code</u></th> <th><u>Wastewater*</u></th> <th><u>Non-Wastewater</u></th> </tr> </thead> <tbody> <tr> <td><u>K062</u></td> <td>_____</td> <td><u><input checked="" type="checkbox"/></u></td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p>* less than 1% TOC by weight and less than 1% filterable solids.</p>	<u>Waste Code</u>	<u>Wastewater*</u>	<u>Non-Wastewater</u>	<u>K062</u>	_____	<u><input checked="" type="checkbox"/></u>	_____	_____	_____	_____	_____	_____	<input checked="" type="checkbox"/>			
<u>Waste Code</u>	<u>Wastewater*</u>	<u>Non-Wastewater</u>																	
<u>K062</u>	_____	<u><input checked="" type="checkbox"/></u>																	
_____	_____	_____																	
_____	_____	_____																	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			Section 728.142: Treatment Standards Expressed as Specified Technologies			✓	
			<p>1) For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers or incineration?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>If yes, specify the method: _____</p>				
			<p>1) For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				
			<p>2) For hazardous waste that contains HOCs in total concentrations greater than or equal to 1000 mg/l or 1000 mg/kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of Part 724, Subpart O or Part 725, Subpart)?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				
			<p>3) Are the following non-wastewater forms of the following hazardous wastes incinerated in accordance with the requirements of 35 Ill. Adm. Code 724, Subpart O or 35 Ill. Adm. Code, Subpart O or burned in boilers or industrial furnaces as defined in 35 Ill. Adm. Code 720 in accordance with 35 Ill. Adm. Code 726: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, U058, U087, U221, U223?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>4) Are the following wastewater forms of the following hazardous wastes treated by carbon adsorption, incineration or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, U058, U087, U221, U223?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>If an alternative method is used, specify the method and state whether the facility has received approval from the Agency for an exemption from the incineration requirement:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Section 728.141 - Treatment Standards Expressed as Concentrations in <u>Waste Extract</u></p> <p>Does the generator mix restricted wastes with different treatment standards?</p> <p>Yes ____ No <input checked="" type="checkbox"/></p> <p>If yes, did the generator select the most stringent treatment standards (728.141(b))?</p> <p>Yes ____ No ____</p> <p>Section 728.143 - Treatment Standards Expressed as Concentrations in <u>Waste</u></p> <p>Does the generator mix restricted wastes with different treatment standards?</p> <p>Yes ____ No <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>If yes, did the generator select the most stringent treatment standards (728.143(b))?</p> <p>Yes ____ No ____ N/A ____</p> <p>Section 728.107 - Waste Analysis</p> <p>Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:</p> <p>1) Knowledge of Waste Yes <input checked="" type="checkbox"/> No ____</p> <p>List the waste for which "applied knowledge" was used and describe the basis of the applied knowledge determination.</p> <p><u>K062</u></p> <p>_____ _____ _____</p> <p>Was all supporting data retained on-site?</p> <p>Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>2) Total Constituent Analysis? Yes <input checked="" type="checkbox"/> No ____ N/A ____</p> <p>List the waste for which total constituent analysis was used and provide the date of the last test, the frequency of testing and note any problems.</p> <p><u>1-14-93</u></p> <p>_____ _____ _____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			3) TCLP? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> List the wastes for which TCLP was used and provide the date of last test, the frequency of testing and note any problems. _____ _____ _____ Section 728.132 - Waste Specific Prohibitions - California List Wastes Are the following hazardous wastes being land disposed: 1) Liquid (*) hazardous wastes having a pH less than or equal to 2.0? Yes <input type="checkbox"/> No <input type="checkbox"/> 2) Liquid (*) hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm? Yes <input type="checkbox"/> No <input type="checkbox"/> 3) Liquid (*) hazardous wastes that are primarily water and contain HOCs in total concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l? Yes <input type="checkbox"/> No <input type="checkbox"/>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>NOTE: The following hazardous wastes are prohibited from land disposal unless they are disposed of in a landfill or surface impoundment which has been granted a case-by-case extension pursuant to Section 728.105:</p> <ol style="list-style-type: none"> 1) Liquid hazardous wastes that contain HOC's in total concentration greater than or equal to 1000 mg/l and are not prohibited under Subsection a) 3); and 2) Non-liquid hazardous wastes containing HOC's in total concentrations greater than or equal to 1000 mg/kg and which are not wastes described in Subsection 728.132(d). <p>NOTE: The requirements of Subsections (a), (d) and (e) do not apply if:</p> <ol style="list-style-type: none"> 1) an adjusted standard has been granted by the Agency pursuant to a No-Migration Petition under Section 728.106; or 2) a case-by-case extension has been granted by the Agency pursuant to Section 728.105; or 3) the waste meets applicable treatment standards or where treatment standards are not specified, the waste is subject to a statutory prohibition. <p>* Did the operator use the Paint Filter Liquids Test Method 9095 (pursuant to Section 720.111) to determine if the waste is a liquid?</p> <p>(NOTE: Wastes subject to a Nationwide Capacity Variance are not subject to this Section).</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.												
				YES	NO														
			<p>Is restricted waste treated or stored greater than the time limits specified in Section 722.134?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p> <p>If yes, the TSD checklist must be completed.</p> <p>Section 728.107 - Waste Analysis</p> <p>1) A. Does the generator ship any waste that exceeds the treatment standards to an off-site facility <i>treatment</i> facility?</p> <p>Yes _____ No <input checked="" type="checkbox"/>* (If no, go to B)</p> <p>Does the generator ship any waste that exceeds <i>exceeds</i> the treatment standards to an off-site disposal <i>disposal</i> facility? (NOTE: If yes, this is a violation of the LDR restrictions.)</p> <p>Yes _____ No _____</p> <p>If yes, identify the waste code and off-site treatment, storage or disposal facilities:</p> <table border="1"> <thead> <tr> <th>Waste Code</th> <th>Facilities</th> <th>Treat/Store/Dispose</th> </tr> </thead> <tbody> <tr><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>_____</td><td>_____</td><td>_____</td></tr> </tbody> </table> <p>Does the generator provide notification to the treatment or storage facility?</p> <p>Yes _____ No _____</p>	Waste Code	Facilities	Treat/Store/Dispose	_____	_____	_____	_____	_____	_____	_____	_____	_____				<p>* Prior to 1992 they did ship some K062 off site to K.A. Steel in Indiana, but in 1992 and at <i>at</i> the current time all K062 has been disposed of on site in the Class I injection well.</p>
Waste Code	Facilities	Treat/Store/Dispose																	
_____	_____	_____																	
_____	_____	_____																	
_____	_____	_____																	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.								
				YES	NO										
			<p>Does the notification contain the following?</p> <p>EPA Hazardous Waste Number(s) Yes ____ No ____</p> <p>Applicable treatment standards and prohibition levels Yes ____ No ____</p> <p>Manifest Number Yes ____ No ____</p> <p>Waste Analysis Date (if available) Yes ____ No ____</p> <p>2) B. Does the facility ship any waste that <u>meets</u> the treatment standards to an off-site disposal facility?</p> <p>Yes ____ No <input checked="" type="checkbox"/> (If no, go to C).</p> <p>If yes, identify the waste code and off-site disposal facilities:</p> <table border="0"> <tr> <td><u>Waste Code</u></td> <td><u>Facility</u></td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> </table> <p>Does the facility provide notification and certification to the disposal facility?</p> <p>Yes ____ No ____</p>	<u>Waste Code</u>	<u>Facility</u>	_____	_____	_____	_____	_____	_____				
<u>Waste Code</u>	<u>Facility</u>														
_____	_____														
_____	_____														
_____	_____														

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Does the notification contain the following:</p> <p>EPA Hazardous Waste Number(s) Yes ____ No ____</p> <p>Applicable treatment standards and prohibition levels Yes ____ No ____</p> <p>Manifest Number Yes ____ No ____</p> <p>Waste Analysis Data (if available) Yes ____ No ____</p> <p>Certification that the waste meets treatment standards (wording in 728.107(a)(2)(ii)) Yes ____ No ____</p> <p>3) C. Is the waste subject to a nationwide variance, case-by-case extension (728.105) or no migration petition (728.106)?</p> <p>Yes ____ No <input checked="" type="checkbox"/> (If no, go to D)</p> <p>If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal?</p> <p>Yes ____ No ____</p> <p>Does the notification contain the following information?</p> <p>EPA Hazardous Waste Number Yes ____ No ____</p> <p>The corresponding treatment standards and all applicable prohibitions Yes ____ No ____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			Manifest Number	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Waste analysis data (if available)	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Date the waste is subject to the prohibitions	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			4) D) Does the facility generate any First, Second or Third Third "soft hammer" waste?				
			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (If No, go to next section)				
			Does the generator provide the following notifi- cation to the receiving facility with each shipment of waste?				
			EPA Hazardous Waste Number	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Applicable prohibition (728.133(f), 728.134(h))	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Manifest Number	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Waste Analysis Data (if available)	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Section 728.130 - Waste Specific Prohibitions - Solvent Wastes			<input checked="" type="checkbox"/>	
			Section 728.131 - Waste Specific Prohibitions - Dioxin Containing Wastes			<input checked="" type="checkbox"/>	
			Section 728.132 - Waste Specific Prohibitions - California List Wastes			<input checked="" type="checkbox"/>	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.												
				YES	NO														
			<p>Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?</p> <p>Yes ____ No <input checked="" type="checkbox"/></p> <p>Did the unit meet the Minimum Technology Requirements (MTR) (i.e., double liner, leachate, collection system, groundwater monitoring)?</p> <p>Yes ____ No ____</p> <p>Treatment Using RCRA 264/265 Exempt Units or Processes</p> <p>Is waste treated in a RCRA 264/265 exempt unit(s) (i.e., boilers, furnaces distillation units, wastewater treatment tanks, elementary neutralization, etc.)?</p> <p>Yes ____ No <input checked="" type="checkbox"/></p> <p>List types of waste treatment units and processes:</p> <table border="1"> <thead> <tr> <th>Waste Code</th> <th>Type of Treatment</th> <th>Treatment Units and Processes</th> </tr> </thead> <tbody> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p>Are treatment residuals generated from these units?</p> <p>Yes ____ No ____</p>	Waste Code	Type of Treatment	Treatment Units and Processes	_____	_____	_____	_____	_____	_____	_____	_____	_____				
Waste Code	Type of Treatment	Treatment Units and Processes																	
_____	_____	_____																	
_____	_____	_____																	
_____	_____	_____																	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>If yes, the residues are subject to the LDR generator requirements.</p> <p>Are these residuals further treated, stored for greater than Section 722.134(a) allows or disposed on-site?</p> <p>Yes ____ No ____</p> <p>If yes, the TSD checklist must be completed.</p> <p>Section 728.150 - Prohibitions on Storage of Restricted Wastes</p> <p>Are restricted wastes stored (greater than 90 days) on-site?</p> <p>Yes ____ No <input checked="" type="checkbox"/></p> <p>If yes, are all containers:</p> <p>2) clearly marked to identify their contents and the date entering storage?</p> <p>Yes ____ No ____ N/A ____</p> <p>Are all tanks:</p> <p>2) clearly marked with a description of their contents, the quantity of wastes received, and date entering storage, or is such information recorded and maintained in the operating record?</p> <p>Yes ____ No ____ N/A ____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Have wastes been stored for more than one year since applicable LDR regulations went into effect?</p> <p>Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>If yes, can the facility show that such storage is necessary to facilitate proper recovery, treatment or disposal?</p> <p>Yes ____ No ____ N/A ____</p> <p>If yes, state how: _____</p> <p>_____</p> <p>_____</p> <p>NOTE: Wastes that are the subject of a no-migration petition, a nationwide variance, a case-by-case extension or meet the treatment standards are not subject to the requirements of Section 728.150.</p> <p>Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:</p> <p>In a facility meeting the TSCA criteria in 40 CFR 761.65(b)?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>More than one year?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.								
				YES	NO										
			<p>Section 728.107 - Waste Analysis</p> <p>1) Does the facility treat restricted wastes other than in surface impoundments?</p> <p>Yes _____ No <input checked="" type="checkbox"/> (If no, go to 728.104 - Surface Impoundments)</p> <p>Describe the waste codes and treatment processes:</p> <table border="0"> <thead> <tr> <th><u>Waste Code</u></th> <th><u>Treatment Processes</u></th> </tr> </thead> <tbody> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p>Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes?</p> <p>Yes _____ No _____</p> <p>Have treatment standards or prohibition levels been met?</p> <p>Yes _____ No _____</p> <p>NOTE: Treatment standards may be expressed as concentrations in the waste (728.107(b)(3)), concentrations in the waste extract (728.107(b)(1)) or combination of both (See Attachment B).</p> <p>2) Does the facility test the treatment residues in accordance with the requirements of Section 728.132(j) (Test methods for California List Wastes)?</p> <p>Yes _____ No _____</p>	<u>Waste Code</u>	<u>Treatment Processes</u>	_____	_____	_____	_____	_____	_____			<input checked="" type="checkbox"/>	
<u>Waste Code</u>	<u>Treatment Processes</u>														
_____	_____														
_____	_____														
_____	_____														

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Does the facility ship any waste or treatment residue to an off-site disposal facility?</p> <p>Yes ____ No ____</p> <p>If yes, does the treatment facility provide notification and certification to the disposal facility?</p> <p>Yes ____ No ____</p> <p>4) Does the notification contain the following?</p> <p>EPA Hazardous Waste Number(s) Yes ____ No ____</p> <p>Applicable treatment standards and prohibition levels Yes ____ No ____</p> <p>Manifest Number Yes ____ No ____</p> <p>Waste Analysis Data (if available) Yes ____ No ____</p> <p>5) Did the treatment facility submit a certification with each shipment of waste or treatment residue to the land disposal facility stating that the waste or treatment residue has been treated in compliance with the treatment standards specified in Subpart D and the prohibitions set forth in Section 728.132?</p> <p>Yes ____ No ____</p> <p>NOTE: Treatment standards may be expressed as a technology or concentration in waste or waste extract. Refer to 728.107(b)(5) for the type of certification required.</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>6) If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements of 728.107(a)(1)?</p> <p>Yes ____ No ____</p> <p><u>(NOTE TO ALL INSPECTORS: The May 8, 1990 deadline for the establishment of treatment standards for all Third Third wastes has been extended until August 8, 1990).</u></p>				

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ROCKFORD REGION
FEB 25 1991
Environmental Protection Agency
State of Illinois

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MAR 15 1993

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Facility Inspection Form for Compliance
with Underground Injection Control Requirements
(Permit and Inspection Fee Form)

FAS

Facility Name: LTV Steel Company IEPA File Heading: LTV Steel
Facility Address: Hennepin Works IEPA I.D. Number: 1558010006
P.O. Box 325 County: Putnam
Hennepin, IL 61327 U.S. EPA I.D. No.: ILD000781591
Facility Contact: Paul Schlingman Inspector(s) Name: Kari Hanson
Title: General Supervisor
Well Name: WDW-1 Date of Inspection: 11-24-92

1. Well Classification Haz. NH

Time (From) 8:58am (To) 9:20am

Class I ✓ ✓ —
Class II —
Class III —
Class IV —
Class V —

Comments: _____

2. Authorization

IEPA Permit: ✓ Permit Number: VIC-004-W1-JL
Authorization By Rule: —
Emergency Permit: — Permit Number: —
Other: —

3. Operational Status

Operating: —
Standby: ✓
Inoperable: —

Comments: Last injection was 11-20-92 at a rate of
100 gallons per minute. Fast rate due to the
acid cleaning of the injection well in 9/92.

	<u>Yes</u>	<u>No</u>	<u>Value</u>
4. <u>Recording Devices</u>			
a. Are continuous recording devices <u>present</u> operating for: (730.113(b)(2))			
1. Injection Pressure**	<input checked="" type="checkbox"/>		
2. Injection Flow Rate**	<input checked="" type="checkbox"/>		
3. Volume**	<input checked="" type="checkbox"/>		
4. Annulus Pressure**	<input checked="" type="checkbox"/>		
5. Temperature	<input checked="" type="checkbox"/>		
6. pH		<input checked="" type="checkbox"/>	
7. Other (specify) <u>Tank #1 level</u>	<input checked="" type="checkbox"/>		
8. Other (specify) <u>Tank #2 level</u>	<input checked="" type="checkbox"/>		
b. Are gauges <u>present</u> operating for:			
1. Injection Pressure	<input checked="" type="checkbox"/>		<u>63 psig</u>
2. Injection Flow Rate	<input checked="" type="checkbox"/>		<u>86 gpm</u>
3. Volume	<input checked="" type="checkbox"/>		<u>148,900 gallons</u>
4. Annulus Pressure	<input checked="" type="checkbox"/>		<u>498 psig</u>
5. Temperature	<input checked="" type="checkbox"/>		<u>Tank #1 - 91°F Tank #2 - 113°F</u>
6. pH	<input checked="" type="checkbox"/>		
7. Other (Specify) <u>Tank #1 level</u>	<input checked="" type="checkbox"/>		<u>19.4 feet</u>
8. Other (Specify) <u>Tank #2 level</u>	<input checked="" type="checkbox"/>		<u>4.3 feet</u>
c. Are all of the above operating within permitted ranges?			
	<input checked="" type="checkbox"/>		
Comments: <u>currently non-operational (already finished injecting)</u> <u>values listed are for last injection.</u>			

*Required for Class I wells

+Required for Authorization by Rule

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
<u>5. Reporting Requirements</u>			
a. Are reports submitted at least quarterly to the Agency on: (730.113(c))			
1. the physical, chemical and other relevant characteristics of the injection fluids+	<u>✓</u>	<u> </u>	<u> </u>
2. the monthly average, maximum and minimum values for injection pressure, flow rate and volume and annular pressure+	<u>✓</u>	<u> </u>	<u> </u>
3. monitor well data+ (well intalled 9/92)	<u>✓</u>	<u> </u>	<u> </u>
b. Was the Agency notified within 24 hours of: (704.181(d))			
1. Any monitoring or other information which indicates that any contamination may cause an endangerment to a USDW+	<u>N/A</u>	<u> </u>	<u> </u>
2. Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between USDW's.+	<u>N/A</u>	<u> </u>	<u> </u>

Comments: _____

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
<u>6. Special Conditions</u>			
a. Are all permit special conditions being met?	<u>✓</u>	<u> </u>	<u> </u>
If no;			
Explain: _____			

7. Pre-Injection Storage Facilities and Transmission Lines

a. Storage Facilities

1. Type of Storage

- A. Tanks ☒ (2 - 159,000 gallons each)
 B. Surface Impoundments ☐

b. Condition of Storage Facility

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
1. Is adequate freeboard being maintained?	<u>N/A</u>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are the dikes maintained to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are the tanks maintained to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is there evidence of past leaks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If so, what steps have been taken to correct and clean up the leak?			

Comments: _____

c. Transmission Lines

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
1. Are transmission lines being maintained to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is there evidence of past leaks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If so, what steps have been taken to correct and clean up the leak?			

Comments: _____

marks:

On Tuesday November 24, 1992 a P.I.F. inspection was conducted by Kari Hanson from the IEPA at LTV Steel. This inspection evaluates the Class I injection well. Paul Schlingman represented LTV. After meeting with Mr. Schlingman we proceeded to the wastewater treatment area. Once there, we inspected the gauges, recorders and injection logs. All of the devices were operating according to the permit. The last injection was Friday November 20, 1992. No violations were observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

FEB 5 1990

5HR-13

Mr. T.A. Zalenski
Assistant Group Counsel
LTV Steel Company
25 West Prospect Avenue
Cleveland, Ohio 44115

RE: LTV Steel Company, Hennepin
Works, Putnam County
ILD 000 781 591

Dear Mr. Zalenski:

Thank you for your letter of September 1, 1989. The United States Environmental Protection Agency (U.S. EPA) recognizes your wish to work constructively with the Agency. However, the U.S. EPA must strongly disagree with LTV Steel Company's (LTV) view of the U.S. EPA's legal authority regarding LTV's Hennepin Works.

A hazardous waste injection well must have authorization to operate under both the Safe Drinking Water Act (SDWA) and the Resource Conservation and Recovery Act (RCRA). Authorization can be obtained under SDWA through an Underground Injection Control (UIC) permit issued by the State of Illinois, and RCRA authorization through interim status which must lead to a RCRA permit-by-rule. Neither RCRA nor SDWA authorization alone is sufficient to inject hazardous waste. Based on our analysis of LTV's records, we have concluded that LTV has qualified for interim status which authorizes continued disposal of hazardous waste. LTV does not have a RCRA permit-by-rule.

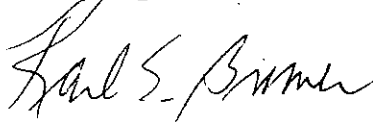
Pursuant to Title 40 of the Code of Federal Regulations (CFR) §270.60(b), a facility can obtain a RCRA permit-by-rule if the owner or operator, 1) has a UIC permit, 2) complies with the conditions of the UIC permit, and 3) for UIC permits issued after November 8, 1984, complies with the corrective action requirements of 40 CFR §264.101. Where the UIC well is the only unit at a facility that requires a RCRA permit (as in LTV's case), the facility must comply with 40 CFR §270.14(d), which is the applicable RCRA permit application requirement.

40 CFR §270.14(d) may require a RCRA Facility Assessment (RFA) when the Division Director ascertains that more complete information is needed regarding solid waste management units (SWMU's). In LITV's case, the Division Director has made such a determination, and is in the process of conducting the RFA.

The first two steps of the RFA, a Preliminary Review (PR) and a Visual Site Inspection (VSI), have been completed. The third step of the RFA is a sampling visit (SV), if necessary. The U.S. EPA is authorized to conduct a SV pursuant to RCRA Section 3007, for the purpose of enforcing RCRA Section 3004(u) and 40 CFR §264.101. See National Standard Co. v. Adamkus, et al, 685 F. Supp. 1040 (N.D. Ill. 1988), affd 881 F.2d 352 (7th Cir. 1989). See also, American Iron and Steel Institute v. U.S. EPA, 886 F.2d. 714 (D.C. Cir. 1987); and Bethlehem Steel Corp., UIC Appeal Nos. 85-8, 86-13, decided January 19, 1989, and currently under review in the Seventh Circuit Court of Appeals in a case consolidated with Inland Steel Co. v EPA, No. 89-1405.

If you have any legal questions, or wish to discuss this matter further, please contact Mr. T. Leverett Nelson, Associate Regional Counsel, at (312) 886-6666. Technical questions may be directed to Mr. Robert Fuhrer of my staff, at (312) 353-4889.

Sincerely,



Karl E. Bremer
Chief, RCRA Permitting Branch

cc: Rich Traub- U.S. EPA
Joe Boyle- U.S. EPA
Dorothy Attermeyer- U.S. EPA
Rett Nelson- U.S.EPA
Leah Haworth- U.S. EPA
Allen Melcer- U.S. EPA
DWPC- IEPA
Karen Nachtwey- IEPA
R.A. Voytko- LITV
Paul N. Schlingman- LITV

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If you have any legal questions, or wish to discuss this matter further, please contact Mr. T. Leverett Nelson, Associate Regional Counsel, at (312) 886-6666. Technical questions may be directed to Mr. Robert Fuhrer of my staff, at (312) 353-4889.

Sincerely,

ORIGINAL SIGNED BY/
KARL BREMER

Karl E. Bremer
Chief, RCRA Permitting Branch

cc: Rich Traub- U.S. EPA
Joe Boyle- U.S. EPA
Dorothy Attermeyer- U.S. EPA
Rett Nelson- U.S. EPA
Leah Haworth- U.S. EPA
Allen Melcer- U.S. EPA
DWPC- IEPA
Karen Nachtwey- IEPA
R.A. Voytko- LTV
Paul N. Schlingman- LTV

RCRA PERMITS	TYP.	AUTH.	IL CHIEF	IN. CHIEF	ML CHIEF	MN/WI CHIEF	OH. CHIEF	RPB CHIEF	O.R. A.D.D.	WMD DIR
INIT. DATE		RAF 1/25/90	1/25/90					1/25/90		

RAF 2/1/90

WMD information 1/29/90
JMS 1/26/90 TLN 1/29/90

101. 15. 1946

DATE	TIME	PLACE	REMARKS	REMARKS	REMARKS	REMARKS	REMARKS	REMARKS
101	15	1946						



217/782-6761

Refer to: 1558010006 -- Putnam County
Hennepin/LTV Steel
ILD0000781591
Compliance File

CERTIFIED # P 115 239 104

December 20, 1989

LTV Steel
ATTN: Mr. R. A. Voytko
3100 East 45th Street
Cleveland, Ohio 44127

Dear Mr. Voytko:

The Agency is in receipt of your December 1, 1989 response(s) to our October 6, 1989 Compliance Inquiry Letter. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 725.242(p) and 725.243 are now considered resolved.

IEPA is returning the previously submitted financial assurance instruments for the SO2 unit since financial assurance for this unit is no longer required.

If you have any questions, please contact Andrew Vollmer at 217/782-6761.

Sincerely,

Angela Aye Tin

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:CD:jas/4343k,48

cc: Division File
Rockford Region
USEPA Region V ✓
Andrew Vollmer
Geordie Smith
Cindy Davis

10 MAY 1989

5HR-12

Paul Schlingman, General Supervisor
Operations Support Services
Jones and Laughlin Steel Corporation
State Route 71
Hennepin, Illinois 61327

Re: Land Disposal Restrictions
Jones and Laughlin Steel
Corporation
ILD 000 781 591

Dear Mr. Schlingman:

On October 19, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous wastes on July 8, 1987, (52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271). Additionally, the land disposal restrictions for the First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions section of the inspection, your facility was inspected as a generator of restricted wastes and was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

Section 3004(f) and (g) of RCRA placed the land disposal of RCRA-regulated hazardous wastes through underground injection control (UIC) wells under a separate schedule. A national capacity variance was granted for the disposal of K062 in UIC wells by 40 CFR 148.14(a) [53 FR 30908]. Consequently, K062 must meet the treatment standards established in 40 CFR Section 268 on August 8, 1990, prior to disposal in UIC wells.

If you have any questions regarding this correspondence, please contact Ronald Brown of my staff at (312 886-4463.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Harry Chappel, IEPA-CMS
Glen Savage, IEPA-FOS

bcc: Jessie Chitt, 5WD-TUB-9

5HR-12:R. BROWN:ev:3-7928:05/08/89:DISK# :FILENAME:PAUL SCHLINGMAN

5-9-89
E.V.

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	REB 5-9-89	TRN 5-9-89	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Jones & Laughlin Steel Corp Hennepin WKS (LTV STEEL CO)

U.S. EPA I.D. No.: IL0000781591

Street: ST RTE 71

City: Hennepin State: IL Zip Code: 61327

Telephone: 815/925-2133

Operator: LTV STEEL CO

Street: 25 Prospect Ave NW

City: Cleveland State: OH Zip Code: 44115

Telephone: 216/622-5000

Owner: LTV STEEL CO

Street: 25 Prospect Ave NW

City: Cleveland State: OH Zip Code: 44115

Telephone: 216/622-5000

Inspection Date: 10/19/88 Time: 9:25-12:15 Weather Conditions: Cloudy 50°F

Name	Affiliation	Telephone
Inspectors: <u>David S. Retzlaff</u>	<u>Illinois EPA</u>	<u>815/987-7404</u>

Facility Representatives: Paul Schlingman - General Supervisor -
Operations Support Services

	RCRA Status	F-Solvent	LDR Status California List
Generator	<input checked="" type="checkbox"/>		
Transporter			
Treater			
Storer	<input checked="" type="checkbox"/>		
Disposer			

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EPA-DLPC

INSPECTION SUMMARY

Jones & Laughlin Steels' Hennepin Works facility (LTV Steel) generates one hazardous waste stream (K062). Approximately 30,000 gallons are generated per day as the waste is generated, it is pumped to two 150,000 gallon above ground tanks. The waste is injected weekly into a permitted Class I well (Permit # UIC-004-W1-JL).

LTV has interim status for the two tanks (S02) however waste has never been stored longer than 90 days. LTV plans to withdraw their Part A, and retain Generator status only.

This facility does not generate any F001-F005 wastes, nor does it generate any California list wastes. The K062 is in the 1st 1/3rd that was restricted, but a two year variance was granted for the injection of this waste.

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

No

N/A

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	_____	_____	_____	_____	_____
2.	F002	_____	_____	_____	_____	_____
3.	F003	_____	_____	_____	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	_____	_____	_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

N/A

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

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OCT 27 1988

IEPA-DLPC

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L *N/A*

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

*K062**✓*

✓

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm

N/A

500 ppm

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes

_____ No

_____ NA

If yes, state reasons for mixing:

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L *N/A*

Note: The prohibitions of 268.32(a)(3) and (c) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 22 OCT 1989

SUBJECT: Corrective Action at Underground Injection Control (UIC)
Permitted Hazardous Waste Sites

FROM: Ed Watters, Chief *Ed*
Underground Injection Control Section

TO: Karl Bremer, Chief
RCRA Permits Branch

I would like to request a meeting with you during the week of October 23, 1989, to discuss how corrective action under Section 3004(u) will be implemented at sites with UIC permits.

As you may know, in 1985 we required facility-wide assessments for preliminary releases of hazardous waste or constituents in UIC permits for Inland Steel and Bethlehem Steel facilities in northwestern Indiana. Both companies appealed this requirement in their permits and both appeals were denied by EPA on January 19, 1989. Their permits then became immediately effective. Their consolidated case is now before the Seventh Circuit Court, in part disputing the propriety of requiring corrective action under Section 3004(u) in a UIC permit. We anticipate a court decision in EPA's favor, especially because of the recent favorable outcome of a similar case in the D.C. circuit court. Neither facility has yet complied with the permit requirement and we are preparing for UIC enforcement action.

Most of our Class I Hazardous waste injection permits come up for revision and renewal this fiscal year. We need to discuss with you the coordination of enforcement for corrective action requirements at those sites without RCRA permits, and who should take the lead at sites with interim status under RCRA. It appears that Inland and Bethlehem both have or had interim status, so discussion between our offices is especially important before we proceed with UIC enforcement action on these cases. The UIC permit for Midwest Steel is also currently being revised, and is due for issuance in December; this also makes it important that a meeting with you on corrective action take place as soon as possible.

Based on review of the current MOU between our offices it appears that the subject of corrective action is inadequately covered. This might be a topic of discussion in future meetings.

If you have questions, please call me at 386-1502, or my Permit Unit Chief, Becky Strom, at 386-6594.

cc: Dave Ullrich, Associate Division Director, Waste Management Division
Bill Muno, Chief, RCRA Enforcement Branch

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